

## REMARKS/ARGUMENTS

### Claim Amendments

The Applicant has amended claims 1, 2, 17, 35, and 36. Applicant respectfully submits no new matter has been added. Accordingly, claims 1 - 36 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### Claim Rejections – 35 U.S.C. § 103 (a)

The Applicant notes that claim rejections in paragraph 4 address the list of claims 11, 13, 21, 23, 24, 32, and 33. Yet the arguments that follow address claims 1-10, 12, 14-20, 22, 25-31, and 34-37. The Applicant will argue the claims addressed in the Examiner's arguments rather than the claims listed in paragraph 4.

Claims 1-10, 12, 14-20, 22, 25-31, and 34-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang. et al. (hereinafter "Chang") US Patent No. 6,681,114 in view of Srinivasan et al. (hereinafter Srinivasan) U.S. Patent No. 6587856. The Applicant respectfully traverses the rejection of these claims.

In the last response, the Applicant described the Applicant's present invention. The Applicant's invention discloses a User Distribution Server (UDS) in a network with multiple servers and users. Each user may be identified by a plurality of user identifiers, each user identifier identifying the user under a particular service environment (subscribers willing to receive a particular service or set of services) and the particular user/service environment combination being associated with a particular server in the network. These particular servers are arranged for acting as primary databases from which user identifiers and necessary service data are downloaded into the UDS which acts as secondary database (Fig 1). The UDS answers a service request related query for a specific user to any service requester node by providing the server identifier to further address the particular server currently serving the user in the applicable service environment. (Page 9, line 19 – page 10, line 7) User data for all the users may be distributed among different servers throughout the network, taking into account the number of different identifiers for identifying the user and the services associated with

the user (Fig. 1). Primary (servers) and secondary databases (UDS) simplify data handling, allowing changes to be easily managed in primary databases, and those changes to be further updated in secondary databases (Abstract). That is, assigning certain user data to any specific network server may be carried out statically, without user participation. As noted below, in contrast to the Chang reference, the operator criteria is neither randomly nor dynamically carried out as a consequence of the user moving from one area to another.

The Chang reference is cited for teaching the limitations of claims 1, 17 and 35 with the exception of teaching the use of a plurality of user identifiers which is addressed below.

The Chang reference discloses an on-demand message system having a profile proxy server coupled to a plurality of message servers for sending multicast messages to mobile users under conditions specified by users and sellers profile information. The user profile information is stored in a profile database associated with a message server that is local to the user's base location, e.g. home address. Each message server includes a profile database for storing user and seller profiles, which are stored dynamically as the user moves from one area to another.

A profile proxy is used when a user is located in a second message server other than the message server containing the user's profile. The profile proxy server is queried by the second message server (col. 6, lines 7-13). Then, the profile proxy server provides an IP address of the first message server towards the second message server, which retrieves the user's profile from the first message server [col. 8 lines 25-35, Fig. 9].

In summary, the profile proxy server in Chang discloses a query mechanism for receiving a service request from a Service Requester Node and a response mechanism for sending a server identifier of a specific network server in response to the service request, wherein the server identifier is usable by the Service Requester Node to determine the specific network server.

The Applicant has reviewed the cited portions of the Chang reference and finds no reference to a mechanism for transferring a plurality of identifiers nor do the cited portions disclose the proxy server associated with the secondary database. The Chang reference fails to teach a mechanism for transferring a plurality of user identifiers to identify the user under different service environments and selected service data per specific network server and per user basis from primary databases associated with respective network servers towards a secondary database included in the profile proxy server. Chang also fails to disclose the profile proxy server associated with the secondary database that provides storage for a plurality of user identifiers and selected service data per specific network server on a per user basis.

The Srinivasan reference is cited for teaching a plurality of user identifiers. As will be explained below, Srinivasan uses the term "identifier" differently from the way the Applicant uses the term "identifier".

Srinivasan teaches a method and system for storing directory information objects in a relational database management system. More specifically, Srinivasan addresses directory systems modeled using aspects of object-oriented techniques and entities, like those based on an LDAP directory protocol.

Srinivasan describes a commonly known LDAP directory system organized in a hierarchical structure having entries organized in a "tree" structure, wherein each entry is a collection of entry attributes and represents an object class. Each entry level, being parent or child or both, represents a particular object class and may be organized in a particular table, namely the Attribute Store Table, having a number of rows for the existing instances, and a number of columns for the different attribute names and attribute values (Fig. 1, Fig. 2A-2C). In this respect, a set of rows having a common identifier (EID) value describes the attributes for the same entry in the Attribute Store Table.

As Srinivasan states, the term "metadata" refers to information that describes the data in a system. Metadata information includes data that describes the structure and parameters of the tables and data maintained in the system. Metadata is conventionally maintained separately from its associated data and tables on the system. However,

Srinivasan teaches how the metadata is maintained within the same table as its associated data. Srinivasan discloses the insertion of additional rows (Fig. 5) to describe metadata associated with a particular instance (EID 100) of an object class, into the table containing original rows for the attributes of EID 100 of the object class (col. 6 lines 25-67, Figs. 4-5).

Each additional row inserted into the table of attributes to describe a metadata is given a distinguishing identifier value (EID 2, Fig. 5) that is indicative of the particular entry for a metadata. Thus, whenever a row is added to the Attribute Store Table with a distinguishing identifier value (EID 2, Fig. 5) the system recognizes that a new metadata definition has been added.

Srinivasan discloses (col. 18, lines 5-20) a system for representing data in a relational database comprising a plurality of identifiers, each identifier (EID 100, or EID 2) associated with a row to indicate whether data or metadata is stored in the identified row.

Srinivasan's use of the term "identifier" is more properly applied as being a "tag" or an "indicator". All rows containing metadata associated with a particular object-class are given a unique and identical "indicator" value (EID 2 in Fig. 5) so that several rows may be linked with the same indicator value. The "user identifier" as used by the Applicant is a true identifier in that a chain of characters unique in the primary and secondary databases, unambiguously distinguishes one user from any other users.

Further, Srinivasan does not disclose any relationship between the nature of the stored data and any remote server dealing with the stored data. Srinivasan teaches the storage and access to object-oriented entities within a relational database management system which is applicable to the internal structure of a database to facilitate both data maintenance and data retrieval and is independent of any remote server configuration and the way data is distributed between a plurality of remote servers. Thus, Srinivasan fails to disclose a database for storing a plurality of user identifiers that identify the user under different service environments, selected service data per specific network server and on a per user basis, such as the primary databases accomplish in the present application.

Srinivasan also fails to disclose a mechanism for transferring a plurality of user identifiers for identifying the user under different service environments and selected service data per specific network server and per user basis from primary databases associated with respective network servers towards a secondary database included in the profile proxy server, and fails to disclose said secondary database included in the profile proxy server to provide storage for said plurality of user identifiers and selected service data per specific network server and per user basis.

The Applicant respectfully submits that neither Srinivasan nor Chang, individually or in combination, fails to include a number of limitations recited in Applicant's claim 1 and additionally, analogous claims 17 and 35: 1) a database for storing a plurality of user identifiers that identify the user under different service environments, selected service data per specific network server and on a per user basis; 2) the mechanism for transferring a plurality of identifiers, or 3) a secondary database included with the profile proxy server for storing the user identifiers and service data. The Applicant respectfully requests the withdrawal of the rejection of these claims.

Claims 1, 17 and 35 are analogous and contain similar limitations. Claims 2-10, 12, 14-16, 18-20, 22, 25-31, and 36-37 depend from the subject independent claims add further limitations to the respective independent claims. The Applicant respectfully requests the withdrawal of the rejection of these claims.

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Claims 11, 13, 21, 23, 24, 32, and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang in view of Srinivasan and further in view of Richard Paul Ejzak (hereinafter Ejzak) U.S. Patent No. 6,871,070. The Applicant respectfully traverses the rejection of these claims.

The Applicant respectfully submits that the Ejzak reference is disqualified as a prior art reference with respect to the present invention. The Ejzak reference shows a filing date of July 31, 2001. The Applicant's application was filed March 4, 2002 in the United States, but claims the benefit of priority of a co-pending U.S. Provisional Application filed March 6, 2001. (Page 1, lines 2-4)

Even so, as discussed previously, the Chang and Srinivasan references neither teach nor suggest the use of user identifiers in the manner of the Applicant's present invention, utilizing a secondary database with a profile proxy server for storing a plurality of user identifiers and for transferring a plurality of user identities from the secondary database to a primary database for identifying the user under different service environments.

The Ejzak reference is cited for teaching Domain name server, Light-Weight Directory Address Protocol, Home Subscription Server, Interrogating Call Status Control Function and Serving Call Status Control Function. Even if the Ejzak reference were not disqualified, Ejzak does not disclose the limitations that are missing from the Chang and Srinivasan references.

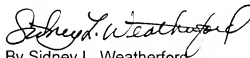
The Chang, Srinivasan and Ejzak references, individually or in combination fail to render claims 11, 13, 21, 23, 24, 32 and 33 un-patentable for at least the reasons that the combination fails to disclose the user identifiers and associated service environments, and sending a specific server ID that can supply a requested service to the requesting node. This being the case, the Applicant respectfully requests withdrawal of the rejection of claims 11, 13, 21, 23, 24, 32, and 33.

### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



By Sidney L. Weatherford  
Registration No. 45,602

Date:

Ericsson Inc.  
6300 Legacy Drive, M/S EVR 1-C-11  
Plano, Texas 75024

(972) 583-8656  
sidney.weatherford@ericsson.com